

**UNE TRIENNIAL REVIEW**  
**EX PARTE CHART – AT&T FILINGS**  
**OCTOBER 4 TO DECEMBER 4, 2002**

<b>DATE FILED</b>	<b>SUBJECT CATEGORY</b>	<b>BRIEF DESCRIPTION</b>	<b>KEY ARGUMENTS/POINTS</b>
12/04/02	UNE-P	Letter from J. Marsh to M. Dortch	Response to WCOM's DS0 Enhanced EELS proposal.
11/26/02	UNE-P	Letter from J. Marsh to M. Dortch	* Analysis of SBC data on UNE-P penetration within its states, demonstrating that UNE-P implementation is broad-based and reaches customers in all density zones. * Analysis of SBC data submission on WorldCom's concentrated EELs proposal, arguing that the data supports and confirms the CLEC data showing that use of UNE-L imposes significant costs on CLECs that incumbents do not face.
11/25/02	UNE-P; Transport; Loops	Ex Parte Letter from J. Marsh to M. Dortch	Submission of a detailed explanation of the methodology used by AT&T to develop its cost estimates regarding the amount of traffic that must be aggregated before a CLEC can economically justify the construction of its own interoffice transport or high-capacity loop facilities. <b>Attachment A:</b> Detailed Description of CLECs' Collocation and Backhaul Infrastructure Costs <b>Attachment B:</b> Estimating the Cost of Loop Construction
11/21/02	UNE-P	Ex Parte Letter from J. Marsh to M. Dortch	Response to SBC's plan for the "Development of a Sustainable Wholesale Model," which demonstrates that SBC's plan would produce a negative operating margin for the average residential customer in each of SBC's states.
11/14/02	UNE-P; Impairment	Letter from R. Beckner to M. Dortch	Submission of Prof. Robert Willig's paper entitled "Determining 'Impairment' Using The Horizontal Merger Guidelines' Entry Analysis," explaining how the entry framework used by the federal antitrust authorities can inform the Commission's impairment analysis in this proceeding.
11/13/02	UNE-P; Impairment; Investment	Letter from J. Cicconi to M. Powell, M. Copps, K. Abernathy and K. Martin	Letter to all Commissioners containing a broad discussion of the entire range of issues raised in this proceeding and outlining a framework for analyzing and resolving the issues.
11/08/02	UNE-P	Letter from J. Marsh to M. Dortch	Presentation on the engineering and economic disadvantages CLECs face in trying to compete in the analog mass-market.

			<b>Attachment:</b> "Promoting Mass-Market Competition: Facing the Analog Wall," a presentation which includes detailed information on the economic impairments associated with the construction and operation of a CLEC backhaul facilities, broken down to average, conservative cost disadvantages per line/per month.
11/08/02	NGDLC	Letter from J. Marsh to M. Dortch	Detailed response to SBC and other ILEC claims that ILECs should not be required to unbundle any of their "new" broadband investments or provide CLECs with access to NGDLC.
10/29/02	UNE-P	Letter from J. Marsh to M. Dortch	Letter outlining Verizon's 3 <sup>rd</sup> quarter performance results, including its growth in operating income, its increased margins, its reduced debt and its impressive LD results.
10/16/02	UNE-P; Investment	Letter from J. Marsh to M. Dortch	Response to BOC claims that UNE-P saps corporate incentives to invest in local networks. <b>Attachment:</b> <i>Correcting the RBOCs' Empirical Analyses Of The Linkage Between UNE-P And Investment</i> , a paper demonstrating that the claims made in the RBOC <i>UNE-P and Investment</i> paper are in error for two independent reasons. First, the "data" the RBOCs adduce for the purposes of their analysis appear to be made up out of whole cloth to achieve a pre-determined result. But even if these self-prepared data were accurate, the numerical and graphical manipulations that the unnamed RBOC authors apply to these "data" are inconsistent with reasonable analytic and statistical technique. When the RBOCs' specially developed data are replaced by the attested data that the industry has reported to the Commission concerning the extent of local competition, and when appropriate analytical techniques are applied to these data, the RBOCs' conclusions that the availability of UNE-P inhibits competitive investment are shown to be false.
10/16/02	UNE-P	Letter from J. Marsh to M. Dortch	Submission of an AT&T news release announcing that AT&T now provides local service to 2 million customers in 8 states and provides examples of some of the competitive benefits that consumers are enjoying as the result of competition.
10/11/02	UNE-P; Investment	Letter from J. Marsh to M. Dortch	Submission of a paper by Prof. Robert Willing entitled "Stimulating Investment and the Telecommunications Act of 1996," and materials that supported Prof. Willig's presentation of the paper to the FCC.

10/08/02	Loops; NGDLC	Letter from J. Marsh to M. Dortch	Submission of presentation materials re: AT&T's position on the availability of loop UNEs , including access to NGDLC.
10/08/02	Transport	Letter from J. Marsh to M. Dortch	Submission of presentation materials re: AT&T's position on the availability of transport UNEs.
10/08/02	UNE-P	Letter from J. Marsh to M. Dortch	Letter re: comments by Ivan Seidenberg of Verizon at Communacopia XI, in which Mr. Seidenberg downplayed the impact of UNE-P on Verizon's business.
10/04/02	UNE-P; Transport; Loops	Letter from J. Marsh to M. Dortch	<ul style="list-style-type: none"> <li>* Submission of presentation materials re: the products and services being offered by AT&amp;T's Business and Consumer Services organizations.</li> <li>* Presentation of a technical discussion comparing the ILEC and CLEC local network architectures and explaining the economic and engineering disadvantages CLECs face in serving the analog mass-market</li> </ul>